

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

NOTICE OF LEAD PLAINTIFFS' MOTION TO SEAL

Lead Plaintiffs Fresno County Employees' Retirement Association and Her Majesty the Queen in Right of Alberta ("Lead Plaintiffs"), by and through their undersigned counsel of record, hereby give Notice that they have moved this Court for entry of an Order permitting Lead Plaintiffs to file under seal their Memorandum of Law and Exhibits in support of their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents.

That Motion is entitled Lead Plaintiffs' Motion To Seal Memorandum Of Law And Exhibits In Support Of Their Motion To Compel Production Of Documents And Opposing Defendants' Request To "Clawback" Non-Privileged Documents.

DATED: October 29, 2015

/s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

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